



## 1. INTRODUCTION

Dwarikesh Sugar Industries Limited (hereinafter referred to as “DSIL” / “Company” / “we” or “us” or “our”) is committed to ensure that every aspect of its operations, including its own actions as well as those of its suppliers and subcontractors, upholds and advances fundamental human rights in alignment with the appropriate role of business, achieved through adherence to corporate policies and compliance with relevant national regulations.

## 2. OBJECTIVE

This Human Rights Policy (Policy) outlines DSIL’s commitment to upholding fundamental human rights and principles in all its business activities and interactions. DSIL’s Human Rights Policy is aligned with principles and standards such as United Nations Declaration of Human Rights (“UN Guiding Principles”), International Labor Organization Declaration on Fundamental Principles and Rights at Work (“ILO Declaration”), United Nations Global Compact (UNGC), SA8000, as well as National Human Rights Commission (NHRC).

## 3. SCOPE

This Policy shall extend to all the employees of the Company, its subsidiaries and Joint Ventures, and Suppliers, Vendors, Contractors etc. of the Company (hereinafter referred to as “Parties”). No Stakeholder can waive compliance with this Policy.

## 4. HUMAN RIGHTS COMMITMENT

At DSIL, we are committed to upholding and respecting human rights in all aspects of our operations. We recognize the impact our actions may have on various stakeholders, including employees, customers, suppliers, contractors, and the communities in which we operate. Therefore, we pledge to abide by the following commitments:

- i. **Employees:** We are committed to providing a safe and inclusive work environment where all employees are treated with dignity and respect. We uphold the rights of our employees, including the right to fair wages, safe working conditions, freedom of association, and protection against discrimination and harassment.

- ii. **Customers:** We are dedicated to serving our customers ethically and responsibly. We ensure that our products and services meet high-quality standards while respecting the rights and interests of our customers. We prioritize transparency, honesty, and fairness in all our dealings with customers.
- iii. **Suppliers, Vendors and Contractors:** We hold our suppliers, vendors and contractors to the same high standards of ethical conduct that we uphold internally. We expect our Parties to adhere to human rights principles, including the prohibition of child labor, forced labor, and discrimination. We engage in transparent and fair procurement practices and actively monitor the human rights performance of our Parties.
- iv. **Communities:** We recognize our responsibility to the communities in which we operate and seek to contribute positively to their well-being. We engage with local communities in a transparent and respectful manner, considering their interests and concerns in our decision-making processes. We strive to minimize any adverse impacts our activities may have on communities and actively support initiatives that promote human rights, social justice, and community development.

By adhering to these commitments, we demonstrate our responsibility to upholding human rights and promoting a culture of respect, integrity, and accountability throughout our Company and beyond.

## 5. POLICY PROVISIONS

At DSIL, we are committed to ensuring that human rights are always upheld across our business operations, spanning all our locations. We adhere to the following principles in our interactions with stakeholders throughout the value chain:

- i. **Non-Discrimination and Harassment-Free Environment:**

We promote a work environment free from discrimination and harassment. DSIL has a zero-tolerance policy towards discrimination based on age, gender, caste, creed, religion, color, national origin, disability, medical condition, pregnancy, sexual orientation, regionalism, political affiliation, or any other grounds.

- ii. **Freedom of Association and Collective Bargaining:**

We uphold the right of employees to exercise freedom of association and collective bargaining. Employees are encouraged to establish and join organizations of their choice without prior authorization.

iii. **Elimination of Child Labor:**

DSIL does not employ child labor at any of our factory locations, regional/branch offices, or sites, including our subsidiaries and Joint ventures as well.

iv. **Prevention of Forced or Compulsory Labor:**

We strictly prohibit forced or compulsory labor across all our locations. DSIL condemns and prohibits any form of slave labor or bonded labor.

v. **Respect for Indigenous Peoples' Rights:**

DSIL respects the rights of indigenous peoples and ensures that their rights are not violated during our business activities.

vi. **Safe Workplaces and Fair Hours Policy:**

At DSIL, we prioritize the safety, well-being, and dignity of all individuals involved in our operations. We ensure safe working conditions and reasonable working hours for our employees, contractors, and suppliers, in compliance with relevant laws and international standards.

vii. **Fair Remuneration:**

DSIL ensures equal opportunities for all employees for career progression. We are committed to providing fair remuneration to all its employees, ensuring that compensation packages are equitable, competitive, and commensurate with the nature of the work performed, as well as the skills, qualifications, and experience of the individual. We adhere to applicable laws and regulations governing wages and benefits, and we strive to maintain transparency in our compensation practices. Additionally, we periodically review and adjust remuneration structures to reflect changes in market conditions and to support the well-being and motivation of our workforce.

**6. HUMAN RIGHTS COMPLIANCE AND ACCOUNTABILITY**

In line with our commitment to human rights, we focus on embedding human rights principles within our Company, including policy and contractual clauses, comprehensive reviews and impact assessments, and supplier compliance evaluations. Through transparency and ethical practices, we foster a culture of respect for human rights across our operations and supply chain.

i. **Inclusion of Human Rights Clauses:**

We will make sure that human rights protection clauses are included in significant investment agreements and contracts to ensure compliance with human rights standards.

ii. **Human Rights Reviews and Impact Assessments:**

We conduct periodic reviews or impact assessments of our operations to identify any human rights violations. Necessary corrective actions are taken promptly if violations are identified.

iii. **Supplier Evaluation and Compliance:**

We periodically evaluate and assess both new and existing suppliers, ensuring compliance with legal, environmental, health, and safety (EHS), and human rights standards. We also ensure that our direct suppliers and contractors do not engage in child labor.

**7. POLICY IMPLEMENTATION**

DSIL's Board of Directors will provide oversight, guidance, objectives, targets, and resource allocation to support the Company's Human Rights Policy, ensuring alignment with our values and goals while promoting ethical conduct across all levels of the Company. The Human Resources (HR) department will ensure effective implementation, monitoring, and enforcement of the Company's Human Rights Policy, fostering a workplace culture that values and respects the rights of all individuals.

**8. TRAINING**

DSIL is dedicated to fostering a culture of ongoing learning, competitiveness, and excellence through effective change management, while upholding principles of ethics, values, and sound governance. To ensure compliance with our Human Rights Policy, DSIL provides ongoing training to employees, including security personnel, on our values, code of conduct, basic human rights, and other behavioral aspects relevant to their duties.

**9. GRIEVANCE MECHANISM**

DSIL provides a grievance redressal mechanism to all its stakeholders to report any violations with respect to this Policy. Our Grievance Officer is responsible for handling any complaints or violations of this Policy, ensuring a prompt and impartial investigation into alleged human rights violations. Their responsibilities and corresponding timelines include:

- i. **Receiving Complaints:** Promptly receive and document complaints related to human rights violations.  
**Timeline:** Initiate the investigation process within 48 hours of receiving the complaint.
- ii. **Investigation:** Conduct thorough investigations into alleged human rights violations, including gathering evidence and consulting stakeholders.  
**Timeline:** Complete investigations within two weeks of receipt of complaint.
- iii. **Resolution:** Work to resolve complaints in a fair and timely manner through mediation, disciplinary action, or Policy adjustments.  
**Timeline:** Aim to reach resolution within one month of completing the investigation.
- iv. **Documentation:** Maintain detailed records of complaints, investigations, and outcomes while ensuring confidentiality and transparency.  
**Timeline:** Document all aspects of the grievance process promptly upon completion of each stage, ensuring records are up-to-date and accurate.
- v. **Reporting:** Provide regular updates to DSIL's BOD and senior management on complaint status, trends, and contribute to the Company's human rights reporting.  
**Timeline:** Quarterly updates on Human Rights Policy complaints, trends and status to BOD and senior management.
- vi. **Follow-Up:** Conduct follow-up checks after resolution to ensure effective implementation of agreed-upon actions.  
**Timeline:** Address any remaining issues promptly and provide adjustments or additional support as needed.

By adhering to these roles, responsibilities, and timelines, the Grievance Officer plays a critical role in ensuring a fair and respectful workplace environment that upholds the principles of human rights for all employees.

In case of registering any complaint or for any questions /query on this Policy please contact Grievance Officer of DSIL at the following address <<https://www.dwarikesh.com/investers-relation.html>>.

## **NON-COMPLIANCE**

Failure to ensure compliance with this Human Rights Policy could lead to disciplinary action initiated by DSIL in accordance with DSIL Code of Conduct (CoC).

## **10. POLICY REVIEW AND UPDATE**

The Board of Directors (BoD) of DSIL will review this Policy annually considering its suitability, adequacy and effectiveness, and update it basis any changes in relevant regulations of laws, internal provisions, mechanisms etc.

This Policy has been reviewed and approved by the Board of Directors of DSIL.

**Issuing Authority: Approved in Board meeting held on 30<sup>th</sup> April 2024**